

1 **SAO**
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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF, NEVADA**

8 HILLCREST INVESTMENTS, LTD., a
9 Canadian Corporation; AMERGOSA
10 ENTERPRISE, LLC,
11 Plaintiffs,

12 vs.

13 AMERICAN BORATE COMPANY a foreign
14 corporation; AMERICAN BORATE COMPANY
15 OF TEXAS a foreign corporation, STATE
16 ENGINEER, STATE OF NEVADA,
17 DEPARTMENT OF CONSERVATION AND
18 NATURAL RESOURCES, DIVISION OF
19 WATER RESOURCES, A Nevada Political
20 Subdivision; RAMM Corporation, a Nevada
21 Corporation; UNITED STATES FISH AND
22 WILD SERVICE a division of the UNITED
23 STATES; NATIONAL PARK SERVICE, a
24 division of the UNITED STATES; and DOES I-
25 V, ROES VI-X,

26 Defendants.

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE
TO FILE RESPONSE TO DEFENDANTS
AMERICAN BORATE COMPANY AND
AMERICAN BORATE COMPANY OF
TEXAS' MOTION TO DISMISS**

(SECOND REQUEST)

22 **COMES NOW**, Plaintiffs HILLCREST INVESTMENTS, LTD. and AMERGOSA
23 ENTERPRISE, LLC ("Plaintiffs") and Defendants, **AMERICAN BORATE COMPANY AND**
24 **AMERICAN BORATE COMPANY OF TEXAS** (hereafter "American Borate") by and
25 through their respective attorneys of record hereby stipulate and agree as follows:

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1 On June 4, 2021, American Borate filed a Motion to Dismiss ("Motion"). See (ECF No.
2 7). Plaintiff's response to the Motion was originally due on June 18, 2021. The parties agreed to
3 extend the response deadline to June 24, 2021. The Court granted the stipulation. (ECF No. 18).
4 The parties submit this second stipulation to extend the deadline to accommodate Plaintiffs'
5 counsel's workload, scheduling conflicts, and a possible resolution to the Motion. The parties
6 request the extension until July 1, 2021. This is the parties' second request.
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9 **LEONARD LAW PC**

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11 /s/ Debbie Leonard

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15 Attorney for American Borate
16 Company and American Borate
Company of Texas

**LAW OFFICES OF BYRON
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/s/ Byron E. Thomas

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Attorney for Plaintiffs

17 IT IS SO ORDERED:
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RICHARD F. BOULWARE, II
21 United States District Judge

22 DATED this 25th day of June, 2021.
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